

From: Assaf, Eugene F.

Sent: Tuesday, November 7, 2017 2:48 PM

To: Little, Brendan <BLittle@levylaw.com>

Cc: Anguas, Ronald K. <ronald.anguas@kirkland.com>; cplacitella@cpirlaw.com; hroth@cpirlaw.com; mcoren@cpirlaw.com; jmplacitella@cpirlaw.com; Williams, Michael F. <mwilliams@kirkland.com>; Bress, Daniel A. <dbress@kirkland.com>; Justin Quinn <JQuinn@rwmlegal.com>; jvilla@wc.com; ggeyeraman@wc.com; etunis@heroldlaw.com; kmarino@khmarino.com; jboyle@khmarino.com; rryan@connellfoley.com; dblatt@wc.com

Subject: Re: Williams, et al. v. BASF Catalysts LLC, et al.

Mr. Little:

I don't understand your statement "please let me know when your list of questions is complete." You have had these questions since Monday, November 4th, and have known about these issues since at least last week when Mr. Placitella disclosed the new information. So, please do not delay in getting us responses, and please forward the information on a rolling basis as it becomes available.

It is difficult to understand why you don't know the answers to the questions posed. Given that you were telling the Court that it should accept your representations in your brief and at argument without the need for an affidavit or certification, one would think you should have the information readily available.

We would ask that you tell us today about the electronic database and whether you agree to produce a document custodian for a deposition the week of November 13. Hopefully the rest of the responses can be provided in writing tomorrow.

Best,

Gene Assaf

On Nov 7, 2017, at 2:35 PM, Little, Brendan <BLittle@levylaw.com> wrote:

Mr. Assaf,

I received your correspondence. Please let me know when your list of questions is complete and I will have a better sense of the time needed to respond. Thanks.

Brendan

--

Brendan E. Little

Levy Konigsberg LLP

800 Third Avenue, 11th Fl., New York, NY 10022

Phone: (212) 605-6282; Fax: (212) 605-6290

From: Anguas, Ronald K. [<mailto:ronald.anguas@kirkland.com>]

Sent: Tuesday, November 07, 2017 1:53 PM

To: cplacitella@cpirlaw.com; Little, Brendan

Cc: hroth@cpirlaw.com; mcoren@cpirlaw.com; jmplacitella@cpirlaw.com; Assaf, Eugene F.; Williams, Michael F.; Bress, Daniel A.; Justin Quinn; jvilla@wc.com; ggeyerma@wc.com; etunis@heroldlaw.com; kmarino@khmarino.com; jboyle@khmarino.com; rryan@connellfoley.com; dblatt@wc.com
Subject: Williams, et al. v. BASF Catalysts LLC, et al.

Counsel:

Please see the attached correspondence from Gene Assaf to Mr. Placitella and Mr. Little.

Best,

Ronald Anguas

Ronald K. Anguas, Jr.

KIRKLAND & ELLIS LLP

655 Fifteenth Street, N.W., Washington, D.C. 20005

T +1 202 879 5091

ronald.anguas@kirkland.com

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Kirkland & Ellis LLP or Kirkland & Ellis International LLP. Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return email or by email to postmaster@kirkland.com, and destroy this communication and all copies thereof, including all attachments.